

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:	Chapter 11
W.R. Grace & Co., <i>et al.</i> ,	Case No. 01-01139 (JKF)
Debtors.	(Jointly Administered)
<b>Hearing Date: April 17, 2006 at 2:00 p.m.</b> <b>Related Docket Nos.: 11850, 12034, 12064, 12065,</b> <b>12086, and 12087</b>	

**LIBBY CLAIMANTS' SUPPLEMENT TO THEIR OBJECTION  
TO DEBTORS' MOTION CONCERNING DISCOVERY  
FROM DR. ALAN C. WHITEHOUSE**

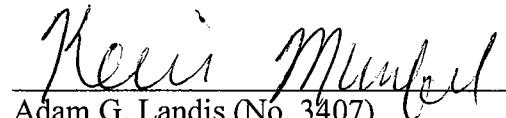
For this Court's information, and in accordance with D. Del. LR 7.1.2(c) (made applicable to these proceedings by Del. Bankr. LR 1001-1(b)), the Libby Claimants<sup>1</sup> hereby supplement their objection to W.R. Grace & Company's Motion for Authorization to Seek Discovery from Dr. Alan C. Whitehouse and for a Protective Order Relating to Production of Documents from Dr. Alan C. Whitehouse dated February 17, 2006 [Docket No. 11850], by attaching as exhibit "A" a copy of Judge Donald Molloy's April 6, 2006 order (the "Order") recently entered in the Criminal Proceeding. The Order denies Grace's request for access to unredacted medical records compiled by Dr. Alan C. Whitehouse.

---

<sup>1</sup> All capitalized terms shall have the definitions provided to them in the Objection unless otherwise defined herein.

Dated: April 10, 2006

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)  
Kerri K. Mumford (No. 4186)  
919 Market Street, Suite 600  
P.O. Box 2087  
Wilmington, DE 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450

-and-

Daniel C. Cohn, Esq.  
Christopher M. Candon, Esq.  
COHN WHITESELL & GOLDBERG LLP  
101 Arch Street  
Boston, MA 02110  
Telephone: (617) 951-2505  
Facsimile: (617) 951-0679

Counsel for the Libby Claimants